

EXHIBIT A

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
C.A. NO.:

JASON YEARY,)
Plaintiff)
)
v.)
)
FORD MOTOR COMPANY,)
Defendant)
)

COMPLAINT AND JURY CLAIM

1. The plaintiff, Jason Yearly, ("Yearly") is an individual who resides at 105 Currier Road, East Falmouth, Barnstable County, Massachusetts.
2. Ford Motor Company is a corporation licensed to do business within the Commonwealth of Massachusetts and having as its registered agent, CT Corporation System, 155 Federal Street, Suite 700, Boston, Suffolk County, Massachusetts.
3. On or about December 18, 2007, the plaintiff, Yearly, was lawfully on the premises at 343 Dillingham Avenue, Falmouth, Barnstable County, ("the premises") as an employee of Lighthouse Ford, Inc. when he was caused to slip and fall on an unnatural accumulation of snow and ice negligently caused or permitted to be present by the defendants, its agents, servants, or employees, sustaining serious physical injury.
4. At all times relevant to the subject Complaint, the premises at 343 Dillingham Avenue, Falmouth, Barnstable County, Massachusetts was owned and controlled by Ford Motor Company.

Count I

5. The plaintiff realleges and repeats all of the allegations contained in Paragraphs 1-4 above, and incorporates each as fully set forth herein.
6. This is a count for negligence and is brought by Yearly against Ford Motor Company.

7. On or about December 18, 2007, Ford Motor Company, as owner of the subject premises, and in control thereof, owed Yearly a duty of reasonable care.
8. Defendant, Ford Motor Company, breached its duty of care to Yearly.
9. As a direct and proximate result of the negligence of Ford Motor Company, Yearly was caused to sustain severe and permanent physical injuries, suffered great pain and anguish of mind, required extensive hospital and medical care and treatment, lost time from work, and his ability to engage in normal and usual activities was adversely affected.

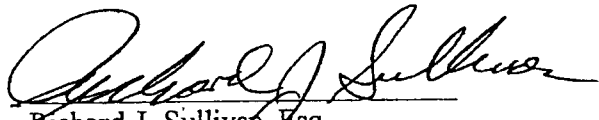
WHEREFORE, the plaintiff, Jason Yearly, demands judgment against the defendant, Ford Motor Company, in an amount sufficient to compensate him for his losses and damages, together with interest and costs.

THE PLAINTIFF DEMANDS A TRIAL BY JURY

Respectfully submitted,
The Plaintiff,
JASON YEARY,

By his attorneys,

SULLIVAN & SULLIVAN, LLP



Richard J. Sullivan, Esq.

BBO#: 554085

Ralph J. Cafarelli, Esq.

BBO#: 069230

40 Washington Street

Wellesley, MA 02481

(781) 263-9400

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